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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH

In re:	Bankruptcy No. 24-23530
AMMON EDWARD BUNDY	Chapter 7
Debtor.	Honorable William T. Thurman

**THE ST. LUKE CREDITORS' MOTION PURSUANT TO FED. R. BANKR. PRO.
2004 FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND
PRODUCTION OF DOCUMENTS BY, BUNDY MOTORS COMPANY WITHOUT
PRIOR NOTICE OR HEARING PURSUANT TO LOCAL RULE 2004-1**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP (together, the "St. Luke's Creditors"), submit their Motion for Rule 2004 Examination of non-debtor Bundy Motors Company.

1. The St. Luke's Creditors are judgment creditors of debtor Ammon Bundy ("Debtor"). Bundy committed intentional torts against them. They obtained a judgment in Idaho in excess of \$50 million against Debtor. Debtor's judgment liability remained in excess of \$50 million on the petition date.

2. Bundy Motors Company is a Nevada corporation that also operates in Utah. Bundy Motors Company has a robust online marketing presence. It has a website, www.bundymotors.us, and has an active presence on each of YouTube, Instagram and Facebook. Bundy Motors Company sells products related to motor vehicles, including, without limitation, an exhaust brake system.

3. Debtor Ammon Bundy actively participates in Bundy Motors Company's marketing activities. Without limitation, Debtor is a principal feature on the company's YouTube channel, and in its Instagram and Facebook posts. Many of the videos seem to have been recorded at Bundy Motor Company's business premises.

4. Under Bankruptcy Rule 2004, this Court can empower the St. Luke's Creditors to take discovery from the Bundy Motors Company. Under Local Rule 2004-1, the Court can order such discovery without notice or hearing.

5. The St. Luke's Creditors wish to take discovery of Bundy Motors Company. Nowhere in Debtor's schedule of assets and liabilities nor his statement of financial affairs does Debtor disclose any relationship with Bundy Motors Company. Without limitation, Bundy does

not disclose that he works for Bundy Motors Company, is paid by Bundy Motors Company, nor has any interest in Bundy Motors Company. However, his active online presence for Bundy Motors Company belies these non-disclosures. The St. Luke's Creditors should be entitled to take discovery to determine whether Bundy's relationship with Bundy Motors Company includes financial components relevant to this bankruptcy case.

6. The St. Luke's Creditors move this Court to enter an Order authorizing the St. Luke's Creditors to conduct an examination of Bundy Motors Company and compel production of documents from Bundy Motors Company. The St. Luke's Creditors move the Court to permit the chapter 7 trustee and the Utah office of the United States Trustee for region 19 to participate in the discovery too.

7. The St. Luke's Creditors shall coordinate the date of the examination with the chapter 7 Trustee and the Utah office of the United States Trustee. The St. Luke's Creditors shall give Bundy Motors Company no fewer than 14 days' prior written notice of the examination in accordance with Local Rule 2004-1(3)(A).

8. The St. Luke's Creditors shall compel Bundy Motors Company's attendance by a subpoena in accordance with Bankruptcy Rule 2004(c), Bankruptcy Rule 9106, and Local Rule 2004-1(3)(A).

WHEREFORE, the St. Luke's Creditors seek relief under Bankruptcy Rule 2004 as set forth above without further notice or hearing. A proposed order has been lodged herewith.

DATED this 30th day of September, 2024.

/s/ Robert A. Faucher

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 30th day of September, 2024, I caused the foregoing to be filed electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Mark C. Rose
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U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by U.S. First Class Mail and/or e-mail as indicated:

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

/s/ Benjamin D. Passey
Benjamin D. Passey
for Holland & Hart LLP